

Black & Veatch

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Date: 6/23Total Pages: 6To: CAL HOGGARD
JULIE RODWELLFrom: KATE SNIDERRe: EMPDebbie: pls deliver to EMP meeting. thanks

Please report any problems in receiving this fax to Madeline Johnson at 206/224-4696.

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**BLACK & VEATCH Waste Science, Inc.**

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King County International Airport
Environmental Consulting

BVWST Project 40557
June 23, 1995

Ms. Julie Rodwell
King County International Airport
7233 Perimeter Rd
Seattle WA 98108
BY FACIMILE AT 298-0190

Dear Julie:

Enclosed are draft minutes from the Boeing EMF meeting. Please review and either distribute as appropriate or call with comments and I will be happy to revise.

My recommendations for KCIA criteria regarding the EMF cleanup are the following:

- Boeing should copy KCIA on all Ecology correspondence and all data collected from the site.
- Boeing should conduct a cleanup of the site in compliance with Ecology's Independent Remedial Action Program and receive a "No Further Action Letter"
- Boeing should do the historical research necessary to confirm the absence of documented underground storage tanks at the site.
- Boeing's proposed site cleanup should identify the characteristics of potential migration of contaminants off the EMF site, and address source control for off-site migration as it's highest priority.

My Initial \$10,000 contract has been fully expended. We have submitted our draft report re: area-wide environmental issues to Jeff Winter for advance review before we submit it to you. It should be to you for review within the next 2 weeks. I believe that my contract obligations regarding the EMF site are complete. However, please feel free to call at any time if I can be of further assistance.

Very truly yours,
BLACK & VEATCH Waste Science, Inc.

Kathryn H. Snider, P.E.
Vice President

**BLACK & VEATCH Waste Science, Inc.
MEMORANDUM**

**Conference Memorandum and Follow-up
Meeting re: EMF Environmental Issues**

**BVWST Project 40557
June 22, 1995**

To: Julie Rodwell

From: Kate Snider *WT*

This memo outlines issues raised in our meeting with Boeing on June 21, 1995 at 1:30. The purpose of the meeting was to informally discuss environmental issues associated with redevelopment of the EMF property. In attendance at the meeting were the following individuals:

**Julie Rodwell, KCIA
Jeff Winter, KCIA
Bill Angle, King County Property Services
Dennis McMahon, King County Prosecutors Office
Kate Snider, Black & Veatch Waste Science
Jim Johnstone, Manager Environmental Affairs, Boeing Defense and Space
Steve Ryan, Environmental Engineer, Boeing Corporate Environmental
Taryn-Marie McCain, Attorney, Boeing General Counsel
Elliott Berkhlser, Boeing Corporate Environmental
Frank Waterworth, Boeing Property Development**

The agenda included the following items:

- brief description of proposed new lease language for lease assignment**
- proposal by KCIA for field-wide cooperative approach to environmental issues**
- presentation by Boeing of proposed cleanup approach at EMF site**
- brief discussion of cleanup and redevelopment timeline and responsibilities**

At the start of the meeting it was determined that Boeing had not received the EMF Brief Document prepared by KCIA, but they had received and reviewed the draft EMF Site Lease Agreement BFI Specifications and Criteria Proposal.

New lease language for lease assignment

KCIA discussed the fact that they were working on new lease language which would apply to the assignment of the lease. Boeing has not seen new language and was a bit surprised. T. McCain stated that the environmental issues in the current lease were negotiated at great length and was concerned about new language. It may have been unclear that the proposed lease

language would apply only to the future tenant. KCIA will transmit new draft language to Boeing as soon as it is available.

Field-wide cooperative approach to environmental issues

K. Snider stated the following: past practices have addressed environmental issues on a site by site basis. Additionally, Boeing has resolved environmental concerns on leased properties directly with the Department of Ecology with out providing notification or copies of correspondence to the landowner. From review of the EMF files at Ecology, it seems that Ecology may presume that Boeing owns the property. Clearly Boeing has acted responsibly, but independent of the County. There are two primary reasons that KCIA in the future must be more heavily involved in environmental issues on airport properties: 1) Airport management, the County Council and the County Executives office are informed and focused on environmental responsibility, and are active participants of the Duwamish Coalition effort to comprehensively address environmental issues in the area; 2) There is a potential for significant redevelopment and land use changes in the near term at BFI which will need to address cleanup issues.

KCIA is interested in implementing smart, effective and cost-effective cleanups at BFI to support industrial and commercial redevelopment. Recent precedent set at redeveloping properties adjacent to the Thes Foss Waterway in Tacoma suggests the potential opportunity to negotiate area-wide cleanup standards and remedies for optional application at properties within the study area. Negotiated items such as an area wide point of compliance for soil cleanup, a non-potable aquifer designation, and acceptance of industrial remedies incorporating institutional controls could assist in streamlining cleanups on redeveloping properties within KCIA boundaries. If there was mutual interest, KCIA and Boeing could potentially work in partnership towards these goals. This was raised in this meeting simply as a topic for future discussion. KCIA has not made a decision to initiate area-wide negotiations. Due to accelerated timing of the EMF redevelopment, it is not necessarily a proposal that the EMF cleanup proceed under an area wide negotiation. Boeing was asked whether they were already negotiating groundwater cleanup standards.

Boeing's responses to the field-wide discussions included the following:

- Boeing has never intentionally mislead Ecology re: property ownership. Boeing has acted responsibly as the site operator. KCIA insured Boeing that this is understood.
- Boeing is not negotiating groundwater cleanup standards at any of the field properties.
- Characterization of the aquifer which may be necessary to negotiate cleanup standards could be costly and complex. The pros and cons of the process of negotiating standards need to be weighed.

- If Boeing leased properties were involved in an area-wide negotiation, the standards would need to be optionally applied, with the potential for specific sites to move forward separately. A concern was stated that area wide negotiations could trigger a cleanup schedule. KCIA stated that that was not the case in the Tacoma Consent Decree.
- Boeing was interested in whether KCIA was planning to go through with this independently, and whether new Consent Decree amendments to MTCA facilitating public property redevelopment would be utilized. Boeing requested more information re: proposed land use changes at BFI.
- Boeing stated that area-wide negotiations would need to address that a portion of the properties are within the specified radius from residences which could trigger stricter cleanup standards. However, they acknowledged that negotiations might be able to allow the strict standard to be relaxed, as many of the residences are across the river or substantially up hill to the east of I-5.

Proposed cleanup approach at EMF site

Boeing presented data summaries for the EMF property and described their proposed approach to investigation and cleanup.

- Summary graphs of historical data for groundwater contamination compared to MTCA B standards were presented. TCE and vinyl chloride are the primary contaminants of concern. Well construction and sampling technique inconsistency make analysis of trends somewhat inconclusive. Currently the high TCE data is off the EMF site near the terminal.
- Boeing has performed groundwater sampling routinely to the present. Their negotiated settlement with Ecology calls for groundwater monitoring, with remedial activity triggered if the data suggest that there is off site migration of contaminants.
- Chemicals chosen for analysis have been determined based on past industrial practices at the facility.
- Boeing plans to do a historical review of site use followed by a targeted investigation including the installation of several new monitoring wells with both soil and groundwater sampling.
- Boeing does not want to initiate investigation until the building is removed. Their preference is that the building be demolished but the building slab left in place during investigation to restrict rainwater infiltration into the potentially contaminated soil areas.
- Boeing believes that the EMF cleanup will involve excavation of chromium contaminated soils which were not excavated in prior cleanup actions due to their adjacency to building foundations. However, the toxic hexavalent chromium in the soil could have naturally degraded to trivalent chromium, which would not require cleanup. Additionally, the cleanup could include a pump and treat

or potentially air sparging groundwater treatment process to bring the TCE and Vinyl Chloride groundwater levels into compliance with standards.

- J. Johnstone discussed the opinion that petroleum hydrocarbons are the other potential contaminant of concern at the site, due to continuous historical use for aircraft maintenance or fueling. Mr. Johnstone stated that area-wide standards for moderate TPH would potentially be very helpful. Boeing is not aware of any existing underground storage tanks on the property. They will also address this issue in their background research prior to investigation.
- Boeing plans to conduct an independent action cleanup, with some active Ecology involvement. They would plan to meet with Ecology following results of the investigation to discuss the proposed remediation.
- Boeing is not expecting any change in the current status of liability at the site during or following the redevelopment process. T. McCain did not want to discuss liability issues at this meeting. She stated that the current lease includes indemnities which address the chain of liability. She stated that it is not clear that Boeing has been the only tenant at the site, and that some problems could have been caused by others. It was surmised that the original two hangers on the property were built by others and then transitioned to Boeing. It was thought that the building contains old growth timber which may be valuable following demolition.
- Jim Johnstone raised another current uncertainty, which is that the highest current concentrations of TCE are in the well closest to the terminal, and that it is uncertain whether the EMF site is the source of that contamination. He agreed that there is a lot of inconsistency in well depth and geologic placement (which make the data interpretation questionable).

Cleanup and redevelopment timeline and responsibilities

- Steve Ryan will be the project manager for the EMF cleanup. He has just been given this project.
- Jeff Zahler will be the primary Boeing contact for EMF site redevelopment following Frank Waterworth's retirement.
- Boeing would like to have the building demolished this year so that they can do their investigation, and hopefully do remediation in summer 1996, when weather conditions are optimum for earthwork.
- KCIA will be copied on Boeing-Ecology communication regarding the EMF property.
- Frank Waterworth stated that based on Boeings preliminary marketing results, the lease could either be assigned or turned back.
- Boeing acknowledged that the redevelopment will primarily be ramp construction with minor building foundations and utilities.